

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

UNITED STATES OF AMERICA

VS.

EMMA RAMOS

§
§
§
§
§

CAUSE NO. 1:21CR00025-2

**MOTION TO EXTEND TIME TO FILE
OBJECTIONS TO PRESENTENCE INVESTIGATIVE REPORT**

TO THE HONORABLE JUDGES OF SAID COURT:

Now comes Emma Ramos, defendant in the above styled and numbered cause, and moves for an extension of time of thirty (30) days to file any objections to the presentence investigative report, and for good cause shows the following:

1. Due to the undersigned attorney's trial schedule, the undersigned attorney has not had an opportunity to conclude the review and preparation of objections to the presentence investigative report.
2. The undersigned attorney requests an extension of thirty (30) days to file any objections to the Presentence Investigation Report.

WHEREFORE, PREMISES CONSIDERED, defendant, Emma Ramos, respectfully requests an extension of thirty (30) days, to file any objections to the Presentence Investigation Report.

Respectfully submitted,

/S/Gary F. Dennison
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Attorney for Emma Ramos

CERTIFICATE OF CONFERENCE

I, the undersigned attorney, by signing below, certify that I have contacted opposing counsel, Donald Carter, by telephone, to reach an agreement as to whether or not he will agree to the foregoing motion. The opposing counsel, Donald Carter will not oppose the motion for extension.

/S/ Gary F. Dennison
Gary F. Dennison

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on opposing counsel, Donald Carter, Asst. U. S. Attorney by email at donald.carter2@usdoj.gov on this the 8th day of February, 2022.

/S/Gary F. Dennison
Gary F. Dennison